



# Woods Hole, Martha's Vineyard and Nantucket Steamship Authority

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July 25, 2006

Dr. Rodney Cluck, Ph.D.  
Cape Wind Project Coordinator  
Minerals Management Service  
Department of Interior  
381 Elden Street, Mail Stop 4042  
Herndon, VA 20164

Re: Comments on the Notice of Intent to Prepare an EIS on the Cape Wind Project

Dear Dr. Cluck:

The Woods Hole, Martha's Vineyard and Nantucket Steamship Authority would like to submit comments relative to the scoping of an Environmental Impact Statement for the proposed Cape Wind Energy Project in Nantucket Sound, Massachusetts.

The Steamship Authority, as part of its statutory mandate, performs an essential governmental function of providing transportation of persons and necessities of life for the Islands of Martha's Vineyard and Nantucket.

In 2005, the Steamship Authority operated over 22,000 trips and carried over 2,600,000 passengers, 455,000 automobiles and 141,000 trucks on two ferry routes between the mainland of Massachusetts and the Islands of Martha's Vineyard and Nantucket.

The proposed wind farm, consisting of 130 wind turbine generators covering approximately 24 square miles of Nantucket Sound, has the potential for creating a significant hazard to safe navigation for our vessels and other users of the waterways.

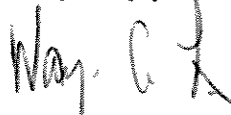
The Minerals Management Service, with its new responsibility for the environmental analysis and regulatory oversight of such projects, must conduct a thorough and comprehensive analysis of all public safety issues including navigational safety and marine radar interference.

Specifically, the Steamship Authority would like to see a safety risk assessment relative to the impacts of the proposed project on the Authority's operations including the risk of collision with other vessels at night or in adverse weather conditions such as fog, the likely changes or constraints in vessel movements as a result of the proposed project, the likelihood of floating ice build-up around and between the towers and the potential impact and interference of wind turbine farms on marine radar, communications and positioning systems. The need for safe separation zones from ferry routes and shipping channels and other exclusion zones, in which it would not be practical or safe to site wind farms, should also be fully addressed in your Environmental Impact Statement.

A 2004 study in the United Kingdom for the Maritime and Coast Guard Agency concluded in part that "clutter in the radar display, due to the presence of wind turbines, was found to be considerable." This study further found that "these effects can be mitigated by vessels keeping well clear of wind farms in open waters or, where navigation is restricted, keeping wind farm boundaries at suitable distances from established traffic routes."

We trust that your review of the proposed Cape Wind Project will fully address the above concerns and that all possible mitigating steps and measures will be taken to significantly reduce any impacts that this project may have on our ability to provide a safe, convenient and reliable ferry service to the Islands of Martha's Vineyard and Nantucket.

Very truly yours,



Wayne C. Lamson  
General Manager